




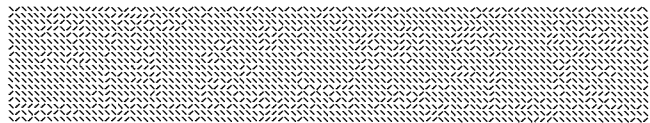
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November 29, 2005

*Via Fax and First Class Mail*

Robert Johnson, Regional Director  
U.S. Bureau of Reclamation  
Lower Colorado Region (Attn: BC00-1000)  
P.O. Box 61470  
Boulder City, NV 89006-1470

Dear Mr. Johnson:

In response to the September 30, 2005 notice in the Federal Register (70 FR 57322), the Mohave County Water Authority (MCWA) submits the following comments regarding management strategies for Lake Powell and Lake Mead under low reservoir conditions including lower basin shortage guidelines. The management strategies being developed by the Bureau are of critical interest and importance to MCWA particularly given the fact that we, and our members, do not have other available surface or groundwater supplies upon which to rely in terms of shortage.

MCWA is generally supportive of the comments submitted by the Arizona Department of Water Resources with a few clarifications and additions as set forth below.

1. Arizona's recommended shortage volumes of 400,000 acre-feet (a/f) to 600,000 (a/f) were developed after a public process and were tentatively agreed to contingent on satisfactory resolution of a number of issues and the scope of the EIS should be broad enough to include same. Among these issues are the appropriate revisions to the 602(a) storage requirements; operation of the Yuma Desalting Plant; resolution of fourth priority shortage sharing issues within Arizona; and Nevada and Mexico sharing in any lower basin shortage.
2. The EIS should be sufficiently broad to allow a range of options in interpreting and resolving shortage sharing issues among fourth priority users within Arizona and give appropriate recognition to the availability and economics of alternative supplies (or the lack thereof). Any necessary reductions should be accomplished in the least damaging way giving due recognition to the arguably immediate impact on MCWA's municipal members of any declared shortage.

*"As you drink the water, remember the spring."*

- Chinese proverb -


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3. Final shortage guidelines should be flexible in order to allow the appropriate response to changing conditions including, but not limited to, improved hydrologic conditions during the year(s) in which a shortage is declared and catastrophic conditions requiring cuts in excess of 600,000 a/f.
4. MCWA understands the Bureau of Reclamation has been consulting with the seven basin states regarding conjunctive management of lakes Powell and Mead. Any change in upper basin deliveries must be consistent with the upper basin's delivery obligations to the lower basin and the upper basin's share of the Mexican obligation.

MCWA supports the efforts of the seven basin states to develop a conjunctive management strategy to minimize shortages to the Lower Division States and avoid curtailment of the Upper Division States provided such strategy can be implemented within the Law of the River. In the interim, however, it is critical the EIS process be sufficiently broad to encompass the issues listed in the responses of ADWR and MCWA.

MCWA appreciates the opportunity to comment on this important issue and looks forward to working with affected parties to reach a solution which benefits all.

Sincerely,



Maureen Rose George  
General Counsel  
Mohave County Water Authority

cc: Tom Griffin, Chairman, MCWA  
MCWA Board Members with attachment  
of ADWR letter dated 11/28/05

*Note: emailed to Herb Guenther 11-29-05*  
